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*Attorneys for Plaintiffs Donald Wortman,
 William Adams, Margaret Garcia and the
 Proposed Class*

Additional Counsel on Signature Page

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

**DONALD WORTMAN, WILLIAM
 ADAMS, MARGARET GARCIA,**
 individually and on behalf of all others
 similarly situated,

Plaintiffs,

vs.

**AIR NEW ZEALAND, ALL NIPPON
 AIRWAYS, CATHAY PACIFIC
 AIRWAYS, CHINA AIRLINES, EVA
 AIRWAYS, JAPAN AIRLINES
 INTERNATIONAL, MALAYSIA
 AIRLINES, NORTHWEST AIRLINES,
 QANTAS AIRWAYS, SINGAPORE
 AIRLINES, THAI AIRWAYS,
 UNITED AIRLINES,**

Defendants.

Case No. 07-cv-05634-EDL

**JOINT STIPULATION PURSUANT TO
 LOCAL RULE 6-1 AND [PROPOSED]
 ORDER EXTENDING TIME TO
 RESPOND TO COMPLAINTS IN
 RELATED ACTIONS**

The Honorable Elizabeth D. Laporte
 Complaint filed November 6, 2007

1 Pursuant to Local Rule 6-1(a), in light of the transfer motion now pending before the
2 Judicial Panel on Multidistrict Litigation ("JPML"), Plaintiffs Daniel Wortman, William Adams
3 and Margaret Garcia ("Plaintiffs") and Defendant Northwest Airlines ("Defendant"), through its
4 counsel, hereby stipulate and agree as follows:

5 IT IS HEREBY STIPULATED AND AGREED that Defendant's time to answer, move
6 or otherwise plead is enlarged until the later of (1) the date when the Defendant would otherwise
7 be required to file a response pursuant to Federal Rule of Civil Procedure 12, or (2) 45 days
8 after the JPML grants, denies, or otherwise disposes of the pending motion. If a consolidated
9 amended complaint is filed by all plaintiffs in a single transferee Court and served on Defendant,
10 Defendant's time to answer, move, or otherwise plead is enlarged until 45 days after such
11 service.

12 WHEREAS Plaintiffs further agree that the deadline to respond to the Complaint of any
13 other cases subsequently related or transferred to this Court shall be extended until the later of
14 the following two dates: (1) the date when the Defendant would otherwise be required to file a
15 response pursuant to Federal Rule of Civil Procedure 12, or (2) 45 days after the JPML grants,
16 denies, or otherwise disposes of the pending motion;

17 WHEREAS Plaintiffs further agree that this extension is available, without further
18 stipulation with counsel for Plaintiffs, to all named Defendants who notify Plaintiffs in writing of
19 their intention to join this extension. Any named Defendant who agrees to join this extension
20 also agrees to each of the provisions of the paragraph below concerning service.

21 IT IS FURTHER STIPULATED AND AGREED that each defense counsel shall accept
22 service on behalf of the Defendant of the summons and complaints in the above-captioned
23 matter, including any amended or consolidated complaints, and further, that such Defendant shall
24 not contest sufficiency of process or service of process. This Stipulation does not constitute a
25 waiver of any other defense including, but not limited to, the defenses of lack of personal or
26 subject matter jurisdiction or improper venue. Nothing in this paragraph shall obligate any
27 Defendant to answer, move or otherwise respond to any complaint until the time provided in the

1 preceding paragraphs. The above notwithstanding, should any Defendant, except pursuant to
2 court order, respond to any complaint in a related matter filed in another United States District
3 Court prior to the date contemplated by this stipulation, then such Defendant shall make a
4 simultaneous response to the complaint in the above-captioned matter.

5 IT IS SO STIPULATED

6
7 Respectfully Submitted,

8
9 Dated: November 29, 2007

COTCHETT, PITRE & McCARTHY

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11
12 By: /s/ Steven N. Williams

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1 Dated: November 29, 2007

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

IT IS FURTHER ORDERED THAT, to conserve party and judicial resources, and in light of the proceedings currently pending before the JPML to consolidate and transfer all pending Pacific Air Transportation Cases to one Court, and pending motion in this Court to consider whether additional cases should be related, this extension is available in ALL RELATED ACTIONS (both current and to be related in the future) to any defendant that provides written notice to plaintiff's counsel in such action of this Order and its intention to join this extension, without further stipulation with counsel for plaintiff(s) in the related actions.

Dated: November __, 2007

Honorable Elizabeth D. Laporte
Judge of the United States District Court